

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
ST. JOSEPH DIVISION**

ANDREA MARTINEZ,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant

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Case No. 5:19-cv-06135-FJG

**CONSENT MOTION FOR 2-WEEK EXTENSION OF TIME FOR
THE UNITED STATES' REPLY SUGGESTIONS TO
MOTIONS FOR PARTIAL SUMMARY JUDGMENT**

Defendant the United States of America moves the Court to enter an order granting a two-week extension of time, up to and including May 19, 2023, in which to file reply suggestions to its Motion for Partial Summary Judgment to Limit Economic Damages and as to Count V – Negligent Infliction of Emotional Distress (Doc. 152) and its Motion for Partial Summary Judgment as to Count III – Assault & Battery and Count IV – False Imprisonment & False Arrest (Doc. 154).

1. This is the United States' first request for an extension of time concerning summary judgment.
2. Plaintiff 's counsel indicated via email that Plaintiff consents to the requested extension of time.
3. Undersigned counsel is currently taking intermittent paternity leave.
4. Accordingly, the extension of time is requested because the United States needs additional time to prepare replies to the motions for partial summary judgment.
5. This motion is not made for the purpose of harassment or for any other improper purpose.

WHEREFORE, Defendant the United States of America moves the Court to enter an order: (1) granting a two-week extension of time, up to and including May 19, 2023, in which to file reply suggestions to its Motion for Partial Summary Judgment to Limit Economic Damages and as to Count V – Negligent Infliction of Emotional Distress (Doc. 152) and its Motion for Partial Summary Judgment as to Count III – Assault & Battery and Count IV – False Imprisonment & False Arrest (Doc. 154); and (2) granting such other and further relief as is just and proper.

Respectfully submitted,

Teresa A. Moore
United States Attorney

By /s/ Alan T. Simpson
Alan T. Simpson, Mo. Bar No. 65183
Assistant United States Attorney
Western District of Missouri
400 East Ninth Street, Suite 5510
Kansas City, Missouri 64106
Telephone: (816) 426-3130
Facsimile: (816) 426-3165
Email: alan.simpson@usdoj.gov
ATTORNEY FOR DEFENDANT
UNITED STATES OF AMERICA